



BOULT • CUMMINGS  
CONNERS • BERRY, P.C.

REC'D TN  
REGULATORY AUTH.

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OFFICE OF THE  
EXECUTIVE SECRETARY  
March 14, 2002

Henry Walker  
(615) 252-2363  
Fax: (615) 252-6363  
Email: hwalker@boultcummings.com

David Waddell  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

Re: *In the Matter of Petition of Tennessee UNE-P Coalition to Open a  
Contested Case Proceeding to Declare Unbundled Switching an  
Unrestricted Unbundled Network Element*  
Docket No. 02-00207

Dear David:

Enclosed for filing in the above-captioned proceeding is the original and thirteen copies of the Petition to Intervene filed on behalf of AT&T Communications of the South Central States. A copy has been forwarded to BellSouth Telecommunications, Inc.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

  
Henry Walker

HW/nl  
Attachment

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**March 13, 2002**

*IN RE: Petition of Tennessee UNE-P Coalition*       )  
*to Open Contested Case Proceeding to Declare*    )  
*Unbundled Switching an Unrestricted*            )  
*Unbundled Network Element..*                    )

*Docket No. 02-00207*

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**PETITION TO INTERVENE**

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AT&T Communications of the South Central States, L.L.C. and TCG MidSouth, Inc. (collectively "AT&T") petition the Authority to intervene in the above-captioned proceeding pursuant to T.C.A. § 4-5-310(b).

AT&T is a competitive local exchange carrier certified by the Tennessee Regulatory Authority ("TRA") to offer intrastate telecommunications services in Tennessee.

The above-captioned docket concerns the petition filed by the Tennessee UNE-P Coalition to request the TRA to hold a contested case proceeding to establish unrestricted local switching as a "new interconnection service." As a competing local exchange carrier in Tennessee, AT&T's legal rights, duties, privileges, immunities, or other legal interests or responsibilities may be affected or determined by the outcome of this proceeding.<sup>1</sup>

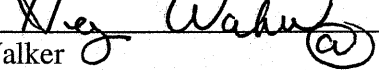
Granting this petition will not impair the orderly and prompt conduct of these proceedings.

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<sup>1</sup> AT&T was aware and supportive of the initial filing by the UNE-P Coalition, but was unable to obtain the necessary corporate approval in time to join in the original complaint.

AT&T therefore requests that this Petition to Intervene be granted and, if granted, that AT&T be considered a member of the UNE-P Coalition.<sup>2</sup>

Respectfully submitted,

By:   
Henry Walker  
Boult, Cummings, Conners & Berry, PLC  
414 Union Street, Suite 1600  
P. O. Box 198062  
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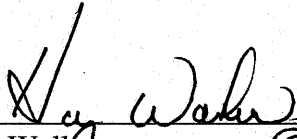
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<sup>2</sup> As the Coalition has previously noted, the Coalition is not a formal organization but a convenient designation of the various individual carriers who are parties to this proceeding.

## CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 14<sup>th</sup> day of March, 2002.

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201-3300

  
Henry Walker 